

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

Lecinda Zimmerman,

Plaintiff,

vs.

General Motors LLC and
Utility Trailer Manufacturing
Company

Defendants.

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Civil Action No. 5:18-cv-00521-C

**UNOPPOSED MOTION TO DISMISS
GENERAL MOTORS LLC WITH PREJUDICE**

To the Honorable United States Judge of Said Court:

COMES NOW, Plaintiff Lecinda Zimmerman, by and through undersigned counsel, and pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, hereby moves to dismiss this matter as to General Motors LLC with prejudice.

I.

1. Plaintiff previously settled with and moved to dismiss this matter as to Utility Trailer Manufacturing Company.

2. Plaintiff has now settled all her claims, actions, and causes of action asserted against Defendant General Motors LLC.

3. Plaintiff therefore moves the Court to dismiss this matter as to General Motors LLC.

4. This case is not a class action, and a receiver has not been appointed.
5. General Motors LLC has not asserted any claims in this matter.
6. Each side will bear its own costs and attorney's fees.
7. This dismissal will dispose of all claims and causes of action before the Court.
8. Plaintiff has conferred with counsel for General Motors LLC, and General Motors LLC does not oppose this motion or the relief sought herein.
9. Accordingly, Plaintiff moves the Court to dismiss with prejudice all claims that Plaintiff asserted or could have asserted against Defendant General Motors LLC in this lawsuit and that all costs of court incurred in connection with said causes of action are to be paid by the party incurring same.

Respectfully submitted,

/s E. Todd Tracy
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Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

Undersigned counsel for Plaintiff certifies that counsel for General Motors LLC has been conferred with and said counsel does not oppose the relief sought herein.

/s E. Todd Tracy
E. Todd Tracy
Andrew G. Counts
John Branum
Jay M. Mitchel

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of February, 2020, I caused to be electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Western District of Oklahoma, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s E. Todd Tracy
E. Todd Tracy
Andrew G. Counts
John Branum
Jay M. Mitchel